STIP. AND [PROPOSED] ORDER RE: ENE DEADLINE

KERR

CASE NO. C-07-3645 JW

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1	As a result of plaintiff's former counsel's motion to withdraw and the resulting stay, the
2	Early Neutral Evaluation ("ENE") set forth this case did not occur by the deadline originally set
3	by the Court. On May 1, 2008, the parties participated in a telephone conference with ADR
4	Program Staff Attorney Robin Siefkin in preparation for rescheduling the ENE. Ms. Siefkin
5	requested the parties to submit a stipulation and proposed order to this Court setting a new ENE
6	deadline. As a result of the parties' schedules, and to allow sufficient time for the ENE to be
7	conducted and completed, the parties jointly request this Court to set August 29, 2008 as the last
8	day to complete ENE (although the parties have scheduled the ENE for June 19, 2008).
9	IT IS SO STIPULATED AND REQUESTED:
10	DATED: June 16, 2008
11	Shannon Alynn Ramsay
12	Plaintiff In Pro Per
13	DATED: June 16, 2008 KERR & WAGSTAFFE LLP
14	
15	By <u>s/</u>
16	MICHAEL VON LOEWENFELDT
17	Attorneys for Defendant The State Bar of California
18	The State But of Cumofina
19	[PROPOSED] ORDER
20	Pursuant to stipulation and good cause appearing therefore, IT IS HEREBY ORDERED
21	THAT the deadline for conducting ENE in this action is continued to August 29, 2008.
22	IT IS SO ORDERED.
23	
24	Dated: June 17, 2008
25	Hon. James Ware
26	United States District Judge
27	
28	

W A G S T A F F E

Case 5:07-cv-03645-JW Document 56 Filed 06/17/2008 Page 3 of 4 I, Michael von Loewenfeldt, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order Regarding Confidentiality. In compliance with General Order 45, X.B., I hereby attest that Shannon Alynn Ramsay, Plaintiff in Pro Per, has concurred in this filing. DATED: June 16, 2008 KERR & WAGSTAFFE LLP By \_\_\_\_ MICHAEL VON LOEWENFELDT Attorneys for Defendant The State Bar of California 

## **CERTIFICATE OF SERVICE**

I, Andrew Hanna, declare that I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Kerr & Wagstaffe LLP, 100 Spear Street, Suite 1800, San Francisco, California 94105.

On June 16, 2008, I served the following document(s):

## JOINT CASE MANAGEMENT CONFERENCE STATEMENT

on the parties listed below as follows:

Shannon Alynn Ramsay 4447 Cowell Blvd. #83 Davis, Ca 95618

By first class mail by placing a true copy thereof in a sealed envelope with postage thereon fully prepaid and placing the envelope in the firm's daily mail processing center for mailing in the United States mail at San Francisco, California.	er
☐ <b>By facsimile machine</b> (FAX) by personally transmitting a true copy thereof via an electronic facsimile machine.	
Ry parsonal sarving by coucing to be personally delivered a true convertere of to the	

**By personal service** by causing to be personally delivered a true copy thereof to the address(es) listed herein at the location listed herein.

☐ **By Federal Express** or overnight courier.

I declare under penalty of perjury under the laws of the Untied States of America that the foregoing is true and correct.

Executed on June 16, 2008, at San Francisco, California.

\_\_\_\_<u>s/</u> Andrew Hanna